

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

CRITICAL PROJECT SERVICES, LLC,

Plaintiff,

v.

Case No. 1:19-cv-00387

BRADLEY GRAY and WORLDWIDE
MISSION CRITICAL, LLC,

Defendants.

PLAINTIFF'S REQUEST FOR ENTRY OF DEFAULT

Pursuant to Federal Rule of Civil Procedure 55(a), Plaintiff Critical Project Services, LLC ("CPS"), by and through undersigned counsel, respectfully requests entry of a default against Defendant Bradley Gray (hereinafter, "Gray"), and states as follows:

1. On April 2, 2019, CPS filed its Complaint ("Complaint") against Defendants Gray and Worldwide Mission Critical, LLC. *See* ECF No. 1.
2. The Clerk of this Court issued a Summons in a Civil Action (the "Summons") to Gray on April 3, 2019. *See* ECF No. 2.
3. Personal service of the Complaint on Gray was properly executed pursuant to Federal Rule of Civil Procedure 4(e)(2)(b) by leaving the Summons and a copy of the Complaint at Gray's home in Ashburn, VA with Fatima Gray, a person of suitable age and discretion who resides there by a private process server on April 6, 2019. An Affidavit of Service was filed with this Court on April 24, 2019. *See* ECF. No. 5.
4. An Answer to the Complaint from Gray was due on April 29, 2019 twenty-one (21) days after the date of service of the Summons and the Complaint.

5. To date, Gray has not answered the Complaint or contacted CPS's counsel to seek an extension of time to answer the Complaint.

6. A declaration attesting to the facts stated herein is attached hereto as "Exhibit A."

WHEREFORE, for the reasons set forth above, CPS respectfully requests that the Clerk of this Court enter a default against Gray as to all claims asserted by CPS.

Dated: May 16, 2019

Respectfully submitted,

/s/ Joseph D. Wilson

/s/ Joseph D. Wilson
Joseph D. Wilson (VSB # 43693)
Kelley Drye & Warren LLP
Washington Harbour, Suite 400
3050 K Street, N.W.
Washington, DC 20007
Telephone: 202.342.8400
Facsimile: 202.342.8451
Email: jwilson@kelleydrye.com

Robert Steiner (*pro hac vice* to be submitted)
Kelley Drye & Warren LLP
101 Park Avenue
New York, NY 10178
Telephone: 212.808.7800
Facsimile: 212.808.7897
Email: rsteiner@kelleydrye.com

Attorneys for Plaintiff
Critical Project Services LLC

CERTIFICATE OF SERVICE

I, hereby certify that on May 16, 2019, a copy of the foregoing document was served by
U.S. Mail on the following:

Bradley Gray
21022 Roaming Shores Terrace
Ashburn, VA 20147

/s/ Joseph D. Wilson

/s/ Joseph D. Wilson
Joseph D. Wilson (VSB # 43693)
Kelley Drye & Warren LLP
Washington Harbour, Suite 400
3050 K Street, N.W.
Washington, DC 20007
Telephone: 202.342.8400
Facsimile: 202.342.8451
Email: jwilson@kelleydrye.com

Robert Steiner (*pro hac vice* to be submitted)
Kelley Drye & Warren LLP
101 Park Avenue
New York, NY 10178
Telephone: 212.808.7800
Facsimile: 212.808.7897
Email: rsteiner@kelleydrye.com

Attorneys for Plaintiff
Critical Project Services LLC